

RICHARD J. THOMAS *
JERRY M. BRYAN
ANNA M. CIAMBOTTI
J. MICHAEL THOMPSON
JOSEPH N. SPANO

**HENDERSON, COVINGTON, MESSENGER,
NEWMAN & THOMAS CO., L.P.A.
A LEGAL PROFESSIONAL CORPORATION
6 FEDERAL PLAZA CENTRAL, SUITE 1300
YOUNGSTOWN, OHIO 44503
TELEPHONE: (330) 744-1148
TELEFAX: (330) 744-3807**

ANDREW M. HENDERSON (1904-1950)
C.A. COVINGTON, JR. (1917-1999)

PARALEGALS
DIANE M. CIAMBOTTI
MISTY INHOUSE

OF COUNSEL
JAMES L. MESSENGER
DAVID K. HOLMQUIST

* ALSO ADMITTED IN PENNSYLVANIA

PENNSYLVANIA TELEPHONE: (412) 553-7474

July 31, 2025

Hon. Joseph A. Marutollo
United States Magistrate Judge
By Electronic Filing

**RE: *ATC Healthcare Services, LLC v. Vibra Healthcare, LLC et al.*
United States District Court for the Eastern District of New York
Case No. 1:25-CV-02641-LDH-JAM**

Your Honor:

Plaintiff ATC Healthcare Services, LLC submits this letter in relation to the Court's minute entry of July 11, 2025. The minute entry acknowledged the parties' joint status report, and imposed a deadline of August 4, 2025, within which to file a stipulation of dismissal.

As with the parties' prior letter filings, and to avoid any issues implicating the unauthorized practice of law by Defendants' counsel, the parties have agreed that undersigned counsel will file this letter on behalf of Plaintiff. It was submitted to Defendants' counsel for review and approval before filing.

The parties have worked diligently to meet the Court's deadline, and complete drafts of the relevant settlement documents have been exchanged. However, these discussions do take time, and counsel do not believe the parties will meet this deadline. No unusual complications have arisen – the parties are simply navigating the usual sort of settlement documentation, and everything seems to be on track. If the Court is willing to grant a brief extension, counsel believe this can be wrapped up before the end of August.

Therefore, Plaintiff – on its own behalf and that of Defendants – respectfully requests an extension of the deadline imposed in the Court's July 11, 2025 minute entry.

Thank you for your consideration.

Very truly yours,

HENDERSON, COVINGTON, MESSENGER,
NEWMAN & THOMAS CO., L.P.A.

A handwritten signature in blue ink, appearing to read "J. Michael Thompson". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

J. Michael Thompson

cc: Douglas C. Yohe, Esq.